MARRERO/S

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PASHA S. ANWAR et al. Plaintiffs, v. FAIRFIELD GREENWICH LIMITED, et al. Defendants. This Document Relates To: *Bhatia* v. *Standard Chartered Int'l (USA) Ltd.* et al., No. 09 CV 2410	)	No. 09 CV 0118 ~~(Bhatia)~~ (VM)

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STIPULATION AND [PROPOSED] ORDER

WHEREAS, on March 16, 2009, Plaintiffs Jitendra Bhatia, Gopal Bhatia,

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Kishanchand Bhatia, Jayshree Bhatia and Mandakini Gajaria (the "*Bhatia* Plaintiffs") filed a complaint (the "Complaint") in the above-captioned action in the United States District Court for the Southern District of New York;

WHEREAS, the *Bhatia* Plaintiffs delivered by hand a copy of the Complaint to the New York office of Standard Chartered Bank on March 31, 2009 and to the registered office of Standard Chartered PLC on April 28, 2009;

WHEREAS, Standard Chartered International (USA) Ltd. and Standard Chartered PLC (the "Standard Chartered Defendants") take no position at this time as to whether there has been sufficient service of process in this action with respect to either of the Standard Chartered Defendants and otherwise reserve any and all defenses to the action, including those defenses provided under Rule 12(b) of the Federal Rules of Civil Procedure;

WHEREAS, on May 6, 2009, the Court consolidated *Bhatia, et al.* v. *Standard Chartered International (USA) et al.*, No. 09-CV-2410 with *Anwar, et al.* v. *Fairfield Greenwich Limited, et al.*, No. 09-CV-0118 ("*Anwar* Consolidated Action") for all pretrial purposes; and

WHEREAS, on September 18, 2009, the *Bhatia* Plaintiffs filed an Amended Complaint.

IT IS HEREBY STIPULATED AND AGREED by and among the undersigned parties through their respective counsel, that, without prejudice to any defense the Standard Chartered Defendants may raise, including those provided under Rule 12(b) of the Federal Rules of Civil Procedure, the time for the Standard Chartered Defendants to answer or otherwise respond to the Amended Complaint is extended up to and including November 16, 2009.

Dated: New York, New York
October 27, 2009

Evelyn H. Seeler (ES-2913)
CROWELL & MORING LLP
590 Madison Avenue
New York, New York 10022
Telephone: (212) 223-4000
Facsimile: (212) 223-4134
eseeler@crowell.com

Attorney for Plaintiffs Jitendra Bhatia, Gopal Bhatia, Kishanchand Bhatia, Jayshree Bhatia and Mandakini Gajaria

Sharon L. Nelles (SN-3144)
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
nelless@sullcrom.com

Attorney for Defendants Standard Chartered International (USA) Ltd. and Standard Chartered PLC

SO ORDERED.

10/30/09

~~HON. VICTOR MARRERO, U.S.D.J.~~
USMJ